

# NATIONAL ASSOCIATION OF BLACK OWNED BROADCASTERS

1201 Connecticut Avenue, N.W., Suite 200, Washington, D.C. 20036  
(202) 463-8970 • Fax: (202) 429-0657 • E-mail: nabobinfo@nabob.org

## BOARD OF DIRECTORS

JAMES L. WINSTON  
*President*  
MICHAEL L. CARTER  
*Vice President*  
KAREN E. SLADE  
*Treasurer*  
LOIS E. WRIGHT  
*Counsel to the Board*  
ARTHUR BENJAMIN  
CAROL MOORE CUTTING  
ALFRED G. LIGGINS  
JERRY LOPES  
DUJUAN MCCOY  
STEVEN ROBERTS  
MELODY SPANN-COOPER  
JAMES E. WOLFE, JR.

October 1, 2015

The Honorable Mignon Clyburn  
Commissioner  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

The Honorable Ajit Pai  
Commissioner  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: MB Docket 13-249, Revitalization of the AM Radio Service

Dear Commissioners Clyburn and Pai:

It appears that the debate over the AM Revitalization proceeding took an unfortunate turn today. NABOB appreciates the leadership you have both taken in this proceeding. As NABOB's name came up in the exchange you had, we feel we should try to bring you together in support of our position. NABOB has been asking for a window for AM station licensees to file for FM translators throughout this proceeding. That was NABOB's position then, and it is our position now. However, this proceeding has been stuck at the Commission for many months with no action. We support adoption of a compromise now, which does not preclude further relief later. Commissioner Clyburn, thank you for pushing to get us some relief now.

The compromise will open a window for AM station licensees to move any translator up to 250 miles to serve their service area. The compromise recognizes NABOB's concern that Class C and D stations will be at a disadvantage with respect to attempting to purchase FM translators

The Honorable Mignon Clyburn  
The Honorable Ajit Pai  
October 1, 2015  
Page 2 of 2

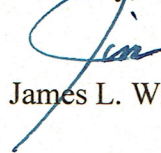
in competition with Class A and B stations. The compromise will have two FM translator windows to address NABOB's concern. In the first window, only licensees of Class C and D AM stations will be allowed to apply to move a FM translator. After that window closes, any AM station can apply to move a FM translator. In addition, the window for Class C and D licensees will be 180 days, which may give Class C and D licensees enough time to raise the capital needed to purchase FM translators.

NABOB will continue to push for a window to enable AM licensees to apply for new FM translators. But this compromise gets some AM relief now and ends the stalemate at the Commission. Moreover, the compromise to have two filing windows, in which the Class C and D licensees get the first opportunity to buy a FM translator, is significant.

NABOB members own 76 AM stations – 51 of them are Class C and D stations. It is our hope that getting the limited relief afforded by the compromise will enable some of these licensees to survive until more relief can be obtained. Holding out for more now could leave some licensees no longer around when the hoped for relief comes.

Commissioners, we thank you for your support on this issue. Commissioner Clyburn, thank you for pushing to break the stalemate and get us some relief now. Commissioner Pai, please support the limited relief available now. We look forward to working with both of you to obtain a filing window for AM licensees to apply for new FM translators as soon as the Commission is willing to establish one.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jim", with a long horizontal stroke extending to the left.

James L. Winston